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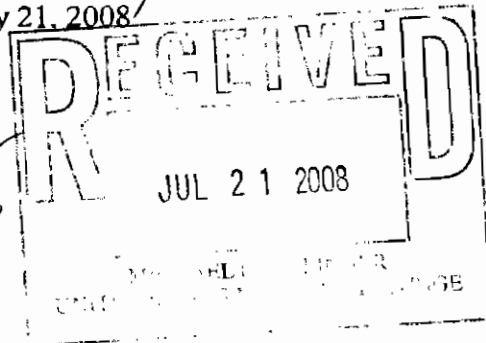
END OF
ORDER

The current pretrial deadlines are adjourned 60 days. Counsel should assume that no further extensions will be granted. However, if my sec. person medical records, they must provide any additional releases to plaintiff promptly.

July 21, 2008

VIA FACSIMILE (212) 805-7928

Honorable Michael H. Dolinger
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: Wilfredo Gonzalez v. Wright, et al.
07-CV-2898 (CM) (MHD) (pro se)

Dear Judge Dolinger:

The State's defendants respectfully request an extension of the close of fact discovery from July 29, 2008 until September 30, 2008. On June 3, 2008, the Court endorsed co-defendant's attorney Michael Catalinotto's letter dated May 30, 2008, and adjourned the deadlines for thirty days, which included the close of discovery, expert witness disclosure and dispositive motions. We are now respectfully seeking a further extension as to all current scheduled deadlines for the below-mentioned reasons. All co-defendants' attorneys concur in this application.

We have received authorizations from Mr. Gonzalez to obtain his medical records from the correctional facility, Albany Medical Center and Westchester Medical Center. We also need Mr. Gonzalez' authorization to obtain copies of any x-rays, cat scans and photographs from these facilities that Mr. Gonzalez has requested in discovery. Furthermore, it appears that Mr. Gonzalez has also received medical treatment regarding his nose from other health care facilities, which were not reflected in Mr. Gonzalez' complaint. We would like to obtain copies of those medical records as well, which would require first obtaining releases for those records.

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We are scheduled to take Mr. Gonzalez' deposition at Sing Sing Correctional Facility on July 22, 2008, which will include attorneys Michael Catalinotto, Terrence Dempsey and Peter Taglia. We have arranged for a Spanish Interpreter to be present, pursuant to Mr. Gonzalez' request.

Currently, the expert disclosure must be served on or about August 14, 2008, and we are seeking an extension to this deadline as well. We expect to seek an expert witness in this case, however, we will need all relevant and pertinent medical records.

In light of the above, the defendants respectfully request an extension of the close of discovery from July 29, 2008 until September 30, 2008.

Very truly yours,



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cc: Wilfredo Wright
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